

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THE BOARD OF EDUCATION OF THE
APPOQUINIMINK SCHOOL DISTRICT,
and THE DELAWARE DEPARTMENT OF
EDUCATION,

Plaintiffs, Counterclaim
Defendants, and

VALERIE WOODRUFF, SECRETARY OF
EDUCATION FOR THE STATE OF
DELAWARE,

Counterclaim Defendant,

v.

MR. & MRS. SQJ, IV, parents of
SQJ, V,

Defendants, and

MR. & MRS. SQJ, IV individually and on behalf
of their son, SQJ, V,

Counterclaim Plaintiffs.

C.A. No. 06-770-JJF

PLAINTIFFS'/CONTERCLAIM DEFENDANTS'
JOINT MOTION FOR SUMMARY JUDGMENT

Plaintiffs/Counterclaim Defendants, by and through the undersigned counsel,
hereby move for entry of an Order granting them Summary Judgment on all Counts of Plaintiffs'
Complaint for the reasons more fully set forth in their Opening Brief filed with the Court on
Monday, December 10, 2007.

{Continued On Next Page}

YOUNG, CONAWAY, STARGATT
& TAYLOR LLP

/s/ Michael P. Stafford

Scott Holt, Esquire (Bar ID 3399)

Michael Stafford, Esquire (Bar ID 4461)

1000 West Street

17th Floor

Wilmington, DE 19899

Phone: (302) 571-6553

sholt@ycst.com

mstafford@ycst.com

Attorneys for the Board of Education of
the Appoquinimink School District

DEPARTMENT OF JUSTICE

/s/ Jennifer L. Kline

Jennifer L. Kline, Esquire (Bar ID 4075)

102 West Water Street

Dover, DE 19901

Phone: (302) 739-7641

Jennifer.Kline@state.de.us

Attorneys for the Delaware Department of
Education, and Secretary of Education,
Valerie S. Woodruff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THE BOARD OF EDUCATION OF THE
APPOQUINIMINK SCHOOL DISTRICT,
and THE DELAWARE DEPARTMENT OF
EDUCATION,

Plaintiffs, Counterclaim
Defendants, and

VALERIE WOODRUFF, SECRETARY OF
EDUCATION FOR THE STATE OF
DELAWARE,

Counterclaim Defendant,

v.

MR. & MRS. SQJ, IV, parents of
SQJ, V,

Defendants, and

MR. & MRS. SQJ, IV individually and on behalf
of their son, SQJ, V,

Counterclaim Plaintiffs.

C.A. No. 06-770-JJF

ORDER

IT IS HEREBY ORDERED this _____ day of _____, 200__, that

Plaintiffs'/Counterclaim Defendants' Joint Motion for Summary Judgment is **GRANTED** and

Judgment is granted in their favor on all counts of the Complaint.

Judge Joseph J. Farnan, Jr.